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7 Attorneys for GOOGLE LLC

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendants.

CASE NO. 3:20-cv-06754-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL GOOGLE LLC'S
OPPOSITION TO SONOS, INC.'S
MOTION TO DISMISS OR TRANSFER
TO THE WESTERN DISTRICT OF
TEXAS**

I, Lindsay Cooper, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLC representing Google LLC (“Google”) in this matter. If called as a witness, I could and would testify competently to the information contained herein.

2. I make this declaration in support of Google’s Administrative Motion to File Under Seal its Opposition to Sonos, Inc.’s Motion to Dismiss or Transfer to the Western District of Texas (“Google’s Administrative Motion”). Google’s Administrative Motion seeks an order sealing the following materials:

Document	Portions to be Filed Under Seal	Party Claiming Confidentiality
Google’s Opposition	Green highlighted portions	Google & Sonos
	Blue highlighted portions	Google
Declaration of Daniel S. Friedland in Support of Google’s Opposition	Blue highlighted portions	Google
Declaration of James Judah in Support of Google’s Opposition	Blue highlighted portions	Google
Ex. 13 to the Declaration of Lindsay Cooper in Support of Google’s Opposition (“Cooper Decl.”)	Blue highlighted portions	Google & Sonos
Ex. 14 to Cooper Decl.	Blue highlighted portions	Google & Sonos
Ex. 15 to Cooper Decl.	Entire document	Google & Sonos
Ex. 16 to Cooper Decl.	Entire document	Google & Sonos

3. Portions of Google’s Opposition and Exhibits 15 and 16 contain, discuss, or refer to Google’s confidential business information, including confidential, non-public agreements between Google and Sonos. Public disclosure of this information would harm Google’s competitive standing and its ability to negotiate future agreements by giving competitors access to Google’s highly confidential business thinking and asymmetrical information about Google’s

1 licensing strategies to other entities. If such information were made public, I understand that
2 Google's competitive standing would be significantly harmed.

3 4. Portions of Google's Opposition, the Declaration of Daniel S. Friedland, and the
4 Declaration of James Judah contain non-public information regarding the number of Google
5 employees in various U.S. locations, as well as the identity and job responsibilities of certain
6 Google employees that have relevant knowledge for the purposes of this litigation. In addition,
7 portions of Exhibit 13 and 14 contain non-public email addresses of Google and Sonos employees.
8 Public disclosure of this information would harm Google, as well as the affected Google
9 employees. Specifically, this information would identify Google's non-public business practices,
10 including internal organizational and operational details, which if disclosed would be useful to
11 competitors in competing with Google by focusing their competitive efforts on the areas where
12 Google invests more human capital. The information to be sealed further identifies Google's
13 nonpublic work assignments to specific employees on specific products, knowledge of which
14 would put Google's business at risk of harm by aiding competitors looking for prospective new
15 hires. If such information were made public, I understand that Google's competitive standing
16 would be significantly harmed.

17
18 I declare under penalty of perjury that to the best of my knowledge the foregoing is true
19 and correct. Executed on October 26, 2020, in San Francisco, California.

20
21 DATED: October 26, 2020

22 By: /s/ Lindsay Cooper
23 Lindsay Cooper

ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Lindsay Cooper has concurred in the aforementioned filing.

/s/ Charles K. Verhoeven

Charles K. Verhoeven